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Attorney for Defendant, Demetrious Polychron

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

THE TOLKIEN TRUST and THE TOLKIEN
ESTATE LTD,

Plaintiffs,

vs.

DEMETRIOUS POLYCHRON,

Defendant.

Case No.: 2:23-cv-04300-SVW(Ex)

**KATIE CHARLESTON'S
DECLARATION IN SUPPORT
OF MOTION TO WITHDRAW
APPEARANCE**

DECLARATION OF KATIE CHARLESTON

1 I, Katie M. Charleston, declare as follows:

2 1. I am the attorney of record for Defendant Demetrious Polychron
3 (“Defendant”). I have personal knowledge of the matters contained in this declaration and,
4 if called as a witness to testify, I could and would competently testify to them.

5 2. There has been a significant breakdown in the attorney-client relationship in
6 that Defendant has been habitually unresponsive, and with looming deadlines, has become
7 even more unresponsive to the undersigned’s multiple attempts at contact.

8 3. On August 21, 2023, I attempted to reach Defendant via telephone and email.
9 No response was received from Defendant.

10 4. On August 28, 2023, I attempted to reach Defendant via telephone and email.
11 No response was received from Defendant.

12 5. On August 29, 2023, I attempted to reach Defendant via his client portal to
13 approve a pleading and no response was received.

14 6. On August 30, 2023, I instructed my staff to attempt to reach Defendant
15 regarding upcoming deadlines and the upcoming hearing date.

16 7. Despite this lack of communication from Defendant, I continued to secure his
17 interests by conferring with opposing counsel, drafting pleadings, notifying Defendant as
18 needed, and timely filing pleadings.

19 8. Defendant has not provided payment for services rendered in over two
20 months.

21 9. I have notified Defendant of the September 11, 2023, hearing on his Motion
22 to Dismiss. I have further notified Defendant that this motion was withdrawn and an
23 answer was filed on his behalf.

24 I declare under penalty of perjury under the laws of the State of California that the
25 foregoing is true and correct.

26 Dated: August 31, 2023

/s/ Katie Charleston

Katie Charleston, Esq.

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DECLARATION OF KATIE CHARLESTON